

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of

The GTE Telephone Operating  
Companies and GTE System  
Telephone Companies

CC Docket No. 92-256

Petition of Waiver of the  
Requirement to place Local and  
Obsolete Services into the  
Federal and State ONA Tariffs

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**GTE's PETITION FOR WAIVER OF THE REQUIREMENT TO PLACE  
CERTAIN LOCAL AND OBSOLETE SERVICES INTO  
FEDERAL AND STATE ONA TARIFFS**

The GTE Telephone Operating Companies ("GTOCs") and GTE System Telephone Companies ("GSTCs"), (collectively "GTE"), respectfully request a waiver of the requirement of the *GTE ONA Order*<sup>1</sup> to place certain local and obsolete services identified in *GTE's ONA Plan*<sup>2</sup> into the Federal and State ONA access tariffs.

**RELIEF REQUESTED**

GTE wishes to comply with the spirit and purpose of the *GTE ONA Order* and the *GTE ONA Approval Order* as follows:

First: By including by reference in its federal access tariff three local services (set out *infra*) identified as Basic Service Elements ("BSEs") rather than creating ONA offerings. These three BSEs are optional features that may be available in connection

<sup>1</sup> Application of Open Network Architecture and Nondiscrimination Safeguards to GTE Corporation, CC Docket 92-256 ("D.92-256"), Report and Order, 9 FCC Rcd 4922 (1994) (the "*GTE ONA Order*").

<sup>2</sup> D.92-256, GTE's Open Network Architecture Plan, filed on January 4, 1995, as supplemented ("*GTE's ONA Plan*"). This plan was approved in substantial part by D.92-256, Memorandum Opinion and Order, DA 95-1468 (released June 29, 1995) ("*GTE ONA Approval Order*").

with Switched Access Service and Private Line Service and are currently provided under GTE's local and general exchange service tariffs. This approach is consistent with the effective tariffs of the Bell Operating Companies ("BOCs").<sup>3</sup>

Second: By eliminating the Basic Serving Arrangement ("BSA") for the Alarm Signal Transport Service ("ASTS") from *GTE's ONA Plan* because the underlying technology supporting this local service is becoming obsolete.

### BACKGROUND

The *GTE ONA Order* specifies:

We require that GTE demonstrate in its ONA plan that its proposed initial offering of ONA services will adequately meet the needs of ESPs in its service areas. We note, based on our preliminary review of the ONA services included in GTE's voluntary ONA program, that the list of services is representative of ONA services currently provided by the BOCs, but we will give parties another opportunity to comment specifically on the initial set of offerings after the plan is filed.<sup>4</sup>

In addition, the *GTE ONA Approval Order* (at paragraph 15) specifies:

GTE, however, asserts that it plans to exclude one BSA -- Type I Dedicated Alert Transport -- and 3 BSEs from its federal access tariffs. Under our rules, all BSAs and BSEs that are technically compatible with interstate access arrangements must be offered under federal tariff, absent a waiver. GTE states that it will file a petition for waiver for the 3 BSEs and, if necessary, the BSA for which it does not propose to file federal tariffs. **We require GTE to file a waiver of the federal tariffing requirement for those 3 BSEs and the BSA by July 7, 1995.** We will review GTE's submission before the August 31, 1995 deadline by which GTE must file its federal tariffs.<sup>5</sup>

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<sup>3</sup> See, e.g., Southwestern Bell Telephone Company Tariff F.C.C. No. 73, First Revised Page 6-46; and US West Communications Tariff F.C.C. No. 5, Original Page 6-72.

<sup>4</sup> *GTE ONA Order*, 9 FCC Rcd at 4939, *footnote omitted*.

<sup>5</sup> *GTE ONA Approval Order* at paragraph 15, *footnotes omitted, emphasis added*.

## DISCUSSION

The following services were identified by GTE as BSEs in *GTE's ONA Plan*:

Direct Inward Dialing ("DID") - DID allows indialing from the exchange and toll network directly to the stations associated with switching equipment located at the customer's premises. The service must be provided on all lines in a trunk group arranged for inward service.

Billed Number Screening ("BNS") - BNS is available to subscriber's of GTE's local exchange services and allows the automatic blocking of third number billing, collect billing, or both to a customer's telephone account. This capability allows the ESP the ability to prevent third number calls from being billed to their local billing accounts and is provided via operator services system. The request by a caller for charges to be billed to a third number are verified either by a call to the third number for verification that the charges will be accepted or via a query to the Line Information Database ("LIDB") to determine the billed party's preference.

Controllink ® Digital Channel Service ("CLDCS") - CLDCS provides an intraexchange digital common line connection between the end user's premise and the local serving wire center. The digital transmission rate available is either DS1 (1.544 Mbps) or DS3 (44.736 Mbps). CLDCS will be used by the customer to aggregate the customer's local telecommunication services onto a digital local loop. CLDCS connections may be made to another central office, owned by GTE, within the same exchange.

Upon preparation of the initial ONA service product line for filing in *GTE's ONA Plan*, GTE considered these three offerings of utility to an ESP. Since they could currently be options on an ESP's local exchange service facilities, the three offerings appeared to fall into the BSE classification under the ONA Model. It was not GTE's intent to place these offerings in GTE's interstate tariff because they are not offered or employed in conjunction with interstate access serving arrangements.<sup>6</sup> Consequently, GTE wishes to identify them as optional services that an ESP might find of utility on their local exchange service arrangement for the offering of their enhanced services and minimization of their local transport costs.

GTE asks that: (i) these services not be placed in the access tariffs as ONA services and (ii) GTE be allowed to refer to these GTE products in its access tariffs as other optional features that may be available in connection with an ESP's local service. This approach is consistent with effective BOC ONA tariffs.

In addition, the following service was identified by GTE as a Basic Serving Arrangement ("BSA") in *GTE's ONA Plan*:

Alarm Signal Transport Service ("ASTS") - ASTS is generally offered via local private line DC (Metallic) and telegraph-grade facilities in conjunction with special scanning equipment in the central office. It is used for alarm services and is not being expanded because of its planned ultimate elimination in favor of newer technology and network arrangements.

The outside plant facilities needed to offer ASTS are increasingly less available because of GTE's migration to fiber optic technology, digital loop carrier, microwave, and coax facilities between GTE's central office and end users. Under these circumstances, while GTE does not propose to eliminate the ASTS local offering in

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<sup>6</sup> GTE *Ex Parte* dated March 13, 1995, Attachment A; GTE *Ex Parte* dated June 19, 1995.

place, it is not technically or economically feasible for GTE to create a new tariffed offering under ONA.<sup>7</sup>

**In conclusion:** GTE respectfully requests a waiver of the requirement to permit GTE to do the following:

First: Instead of placing three BSEs -- identified *supra* as DID, BNS, CLDCS -- into GTE's Federal and State ONA access tariffs, to include these BSEs by reference in GTE's access tariffs as other optional features that may be available in connection with an ESP's local service.


Second: Remove ASTS from *GTE's ONA Plan* because the underlying technology supporting this local service is becoming obsolete.

Respectfully submitted,

The GTE Telephone Operating  
Companies and GTE System  
Companies

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<sup>7</sup> The single BSA and three BSEs in question were identified by GTE as ONA services in *GTE's ONA Plan* because of GTE's understanding that these currently available services met the Commission's criteria for an ONA service, *i.e.*, essentially expected market demand, the services' utility as perceived by enhanced services competitors, and technical and costing feasibility. *GTE ONA Order*, 9 FCC Rcd at 4939 and n.78.